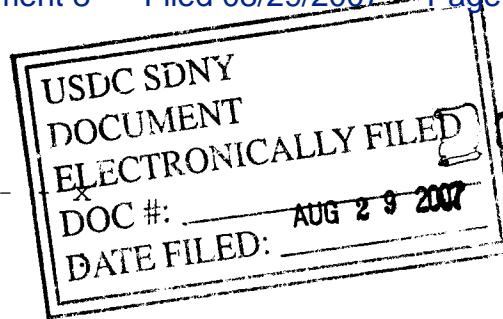


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -



INDICTMENT

VYACHESLAV MANOKHIN,
VLADIMIR DEREVIANKO, and
KAMILJAN TURSUNOV,

Defendants.

: 07 Cr.

: **07 CRIM. 815**

- - - - - x
COUNT ONE

The Grand Jury charges:

1. From in or about April 2005, up to and including on or about August 6, 2007, in the Southern District of New York and elsewhere, VYACHESLAV MANOKHIN, VLADIMIR DEREVIANKO, and KAMILJAN TURSUNOV, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the laws of the United States, to wit, to violate Section 1546(a) of Title 18, United States Code.

2. It was a part and an object of the conspiracy that VYACHESLAV MANOKHIN, VLADIMIR DEREVIANKO, and KAMILJAN TURSUNOV, the defendants, and others known and unknown, unlawfully, wilfully, and knowingly would and did use, possess, obtain, accept, and receive an immigrant and nonimmigrant visa, permit, border crossing card, alien registration receipt card and other document prescribed by statute and regulation for entry into and

as evidence of authorized stay and employment in the United States, knowing it to have been procured by means of a false claim and statement, and to have been otherwise procured by fraud and unlawfully obtained, in violation of Title 18, United States Code, Section 1546(a).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about June 26, 2005, KAMILJAN TURSUNOV, the defendant, entered the United States, purportedly to attend a United Nations conference, when, in truth and in fact, TURSUNOV did not attend the United Nations conference, and did not enter the United States intending to do so.

b. On or about August 18, 2005, at United Nations headquarters in Manhattan, New York, VYACHESLAV MANOKHIN, the defendant, provided ten fraudulent letters to another person, in support of, among other things, various aliens' applications for entry visas to enter the United States for a United Nations conference.

c. On or about February 5, 2007, VLADIMIR DEREVIANKO, the defendant, represented to a federal immigration official that a conference would be attended that day by

approximately ten people when, in truth and in fact, that was not the case.

(Title 18, United States Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

4. On or about February 5, 2007, in the Southern District of New York and elsewhere, VLADIMIR DEREVIANKO, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit, an investigation being conducted by federal immigration officials, unlawfully, wilfully and knowingly falsified, concealed and covered up by trick, scheme, and device material facts, and made materially false, fictitious and fraudulent statements and representations, to wit, DEREVIANKO told a federal immigration official that a conference would be attended that day by approximately ten people when, in truth and in fact, that was not the case.

(Title 18, United States Code, Section 1001(a).)

Forfeiture Allegations

5. As the result of committing the offense alleged in Counts One and Two of this Indictment, VYACHESLAV MANOKHIN, VLADIMIR DEREVIANKO, and KAMILJAN TURSUNOV, the defendants, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 982(a)(3) and 982(a)(6), all conveyances used in

the commission of the violations; all property, real and personal, that constitutes or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offenses; and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate, the commission of the offenses, including but not limited to the following:

a. Money Judgment

A sum of money representing property that was involved, directly or indirectly, in the offenses or is traceable to such property.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of VYACHESLAV MANOKHIN, VLADIMIR DEREVIANKO, and KAMILJAN TURSUNOV, the defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property

which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of VYACHESLAV MANOKHIN, VLADIMIR DEREVIANKO, and KAMILJAN TURSUNOV, the defendants, up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982(a)(3) and 982(a)(6).)

Foreperson
FOREPERSON

Michael J. Garcia
MICHAEL J. GARCIA
United States Attorney

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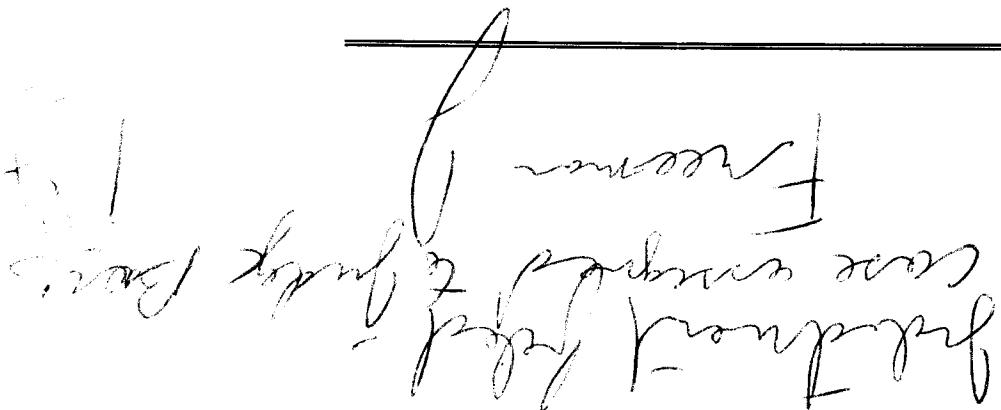
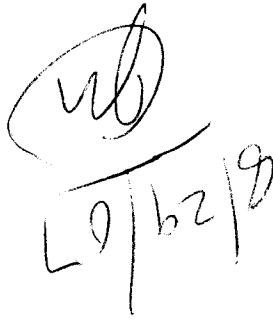
07 Cr.

(18 U.S.C. §§ 371, 1001, 1546(a))

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.



8/29/07